

REMARKS

Claims 1-25 are pending in the present patent application. Claims 1-25 stand rejected. This application continues to include claims 1-25.

Applicants thank the Examiner for withdrawing the rejection of claims 1 and 11 under 35 U.S.C. §101 and the rejection of claim 1 under 35 U.S.C. §102(b).

Claims 1, 9, 10, 17, and 25 were rejected under 35 U.S.C. §103(a) as being unpatentable over Buse, et al., U.S. Patent No. 6,810,420 B1 (hereinafter, Buse) in view of Cheshire, S., Current Meeting Report, Cheshire, et al., 03/99 (hereinafter, Cheshire).

Applicants respectfully request reconsideration in view of the following.

Buse is directed to the allocation of a protocol (IP) address to a device newly connected into the network (col. 1, lines 8-9). Buse discloses a discovery scheme which can be operated by a proxy device such as a personal computer coupled to a local area network, and which facilitates the discovery of devices which may or may not be configured with an IP address (col. 1, lines 39-42). The discovery protocol performed by the proxy employs three basic packets distinguished by different op-codes (col. 2, lines 22-27, Figs. 2 and 3). The proxy periodically sends the first packet, a frame having an “ARE\_YOU\_THERE!” op-code (col. 2, lines 27-30, Fig. 2). The device responds with a reply in the form of a control frame having an “I\_AM\_HERE” op-code, and returns its MAC address (col. 2, lines 30-33, Figs. 2, 4, and 5). When the proxy has resolved an IP address for the device, it sends a declaratory message, “YOU\_ARE,” to the device, including an IP address allocated to the device (col. 2, lines 50-54, Fig. 2). The device then configures itself with the supplied parameters, and sends

an “I\_AM\_HERE” frame with the address field being set to the allocated IP address (col. 2, lines 54-58).

In order to resolve an IP address for the device, the proxy first sends a DHCP request, and if a DHCP server is available, that server provides a DHCP response including an IP address (col. 3, lines 23-26). If there is no DHCP response, the proxy allocates an IP address using Automatic Private IP addressing (col. 3, lines 28-37), and may verify that there is no address conflict using address resolution protocol or an ICMP echo request (col. 3, lines 37-41).

Cheshire is directed to home networks (page 1). Cheshire discloses, in meeting minutes pertaining to automatic IP address assignment for a link local address with IPv4 (page 1), a basic overview of the operation of an IPv4 address self configuration as currently implemented in the Apple MAC operating system OS 8.5 (pages 2-3). The IPv4 operation includes picking a random address, sending an ARP probe to verify that the address is not already in use, and if the address is in use, iterating the picking and repeating steps 10 times at most, otherwise configuring the interface with the IP address (page 3).

Applicants believe that claims 1, 9, 10, 17, and 25 patentably define Applicants' invention over the cited references, Buse in view of Cheshire, taken alone or in combination, for at least the reasons set forth below.

Claim 1 is directed to a method of automatically assigning an internet protocol address to a device. Claim 1 recites, in part, said computer performing the steps of: generating an internet protocol address; incorporating said internet protocol address in an address resolution protocol probe; sending said address resolution protocol probe on said network; and determining whether a response to said address resolution protocol probe indicates that said

internet protocol address is in use; wherein if said internet protocol address is not in use, then performing the step of assigning said internet protocol address to said network adapter via said network.

In contrast to claim 1, Buse discloses obtaining an IP address via a DHCP request (col. 3, lines 23-26), and if no response is obtained, using Automatic Private IP addressing (col. 3, lines 28-37), and then sending the IP address to the device to be configured (col. 2, lines 50-54). These steps performed by Buse are clearly different procedures for obtaining and providing an IP address than the steps of claim 1, and clearly do not disclose, teach, or suggest generating an internet protocol address; incorporating the internet protocol address in an address resolution protocol probe; sending the address resolution protocol probe on the network; and determining whether a response to the address resolution protocol probe indicates that the internet protocol address is in use; wherein if the internet protocol address is not in use, then performing the step of assigning the internet protocol address to the network adapter via the network, as recited in claim 1.

However, the Examiner asserts that it would have been obvious to one having ordinary skill in the art at the time Applicants' invention was made to modify the teachings of Buse with Cheshire by incorporating into the Buse method the use of a probe, and the assignment of an IP address to the device's network interface. Applicants respectfully disagree that Applicants' invention is obvious as with respect to Buse in view of Cheshire for at least the reasons set forth below.

Applicants respectfully submit that the Examiner has not met the required burden of factually supporting a *prima facie* conclusion of obviousness (MPEP 2142, Rev. 2, May 2004, Page 2100-128, left column), which requires that there must be suggestion or motivation to

modify or combine the references, and that the Examiner must provide a “suggestion of the desirability of doing what the inventor has done” (MPEP 2142, Rev. 2, May 2004, Page 2100-128, right column). For example, the Examiner has not provided any such motivation based on the references or knowledge generally available to those of ordinary skill in the art. Although the Examiner makes generalized statements pertaining to devices connected to a network being identified via an IP address (middle of page 2 of Detailed Action), such statements simply do not indicate a motivation to modify or combine references.

In particular, MPEP 2142 provides that

To support the conclusion that the claimed invention is directed to obvious subject matter, *either the references must expressly or impliedly suggest the claimed invention or the Examiner must present a convincing line of reasoning* as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. (MPEP 2142, Rev. 2, May 2004, Page 2100-128, right column)(emphasis added).

However, the cited references, Buse and Cheshire, do not “expressly or impliedly suggest Applicants claimed invention,” and nor does the Examiner assert as much.

In addition, Applicants respectfully submit that the Examiner has not provided “a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references” (emphasis added). Rather, the Examiner simply provided generalized statements pertaining to devices connected to a network being identified via an IP address. Without a motivation to combine, a rejection based on a *prima facie* case of obviousness is improper (MPEP 2143.01, Rev. 2, May 2004, Page 2100-129, right column).

Further, “[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the

combination.” (MPEP 2143.01, Rev. 2, May 2004, Page 2100-131, left column). However, neither Buse nor Cheshire, taken alone or in combination, suggest “the desirability of the combination,” and nor does the Examiner assert as much.

The expectation of some advantage is the strongest rationale for combining references (MPEP 2144, Rev. 2, May 2004, Page 2100-134, right column), yet the Examiner has not indicated any expectation of an advantage by combining Buse with Cheshire. Nor can Applicants’ see any advantage over the Buse disclosure by modifying Buse with Cheshire, since Buse discloses its own functional method without need of modification.

Indeed, there would be no motivation to modify or combine Buse and Cheshire to achieve Applicants’ claimed invention. For example, Buse already discloses the allocation of an IP address by proxy to a device in a local area network (col. 1, lines 1-2). Hence, there would be no motivation to modify Buse with the teachings of Cheshire to achieve a result that is already achieved by Buse, but by using a different method. There is certainly no teaching by Buse and/or Cheshire to modify the teachings of Buse to achieve the same result by a different method, e.g., by incorporating the teachings of Cheshire.

In addition, “[i]f the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious.” (MPEP 2143.01, Rev. 2, May 2004, Page 2100-132, left column, emphasis in original). Applicants respectfully submit that the modification of Buse with Cheshire would impermissibly change the principle of operation of the Buse disclosure. For example, Buse discloses the allocation of an IP address by proxy to a device in a local area network (col. 1, lines 1-2) by obtaining an IP address via a DHCP request (col. 3, lines 23-26), and if no response is obtained, using

Automatic Private IP addressing (col. 3, lines 28-37). However, to modify Buse with Cheshire so as to perform the steps of claim 1, e.g., generating an internet protocol address; incorporating the internet protocol address in an address resolution protocol probe; sending the address resolution protocol probe on the network; and determining whether a response to the address resolution protocol probe indicates that the internet protocol address is in use; wherein if the internet protocol address is not in use, then performing the step of assigning the internet protocol address to the network adapter via the network, would be to change the principle of operation of the Buse disclosure, since the method of claim 1 is clearly differentiated from allocating an IP address by proxy by obtaining an IP address via a DHCP request, and if no response is obtained, using Automatic Private IP addressing, as disclosed by Buse.

Further, even if combined, although Applicants contend that such a combination would be improper, the combination of Buse and Cheshire would not yield Applicants invention, since, as set forth in Applicants previous responses, Cheshire is directed to self-configuration, and wherein Buse is directed to obtaining an IP address for another device by a method clearly different from that of Applicants' claimed invention.

Accordingly, for at least the reasons set forth above, claim 1 is not obvious over Buse in view of Cheshire. Applicants thus respectfully request that the rejection of claim 1 be withdrawn.

Claims 9 and 10 are believed allowable due to their dependence on otherwise allowable base claim 1. In addition, claims 9 and 10 further and patentably define Applicants' invention over Buse in view of Cheshire.

Claim 17 is directed to a network based imaging system. Claim 17 recites, in part, wherein said computer executes instructions which generate an internet protocol address, incorporate said internet protocol address into an address resolution protocol probe, send said address resolution protocol probe on said network, utilize a response to said address resolution protocol probe to determine if said internet protocol address is in use and if said internet protocol address is not in use, then assign said internet protocol address to said network adapter via said network. Claim 17 is believed allowable for substantially the same reasons as set forth above with respect to claim 1.

Claim 17 also recites, in part, an imaging device; and a network adapter communicatively coupling said imaging device to said network, said network providing communicative interconnection between said computer and said network adapter. Buse does not disclose, teach, or suggest an imaging device, and nor does the Examiner assert as much. In addition, although Cheshire offhandedly mentions “printers,” (page 5), Cheshire does not disclose, teach, or suggest an imaging device; and a network adapter communicatively coupling the imaging device to the network, the network providing communicative interconnection between the computer and the network adapter.

MPEP 2142 requires that in order to establish a *prima facie* case of obviousness, all claim limitations must be taught or suggested by the prior art references (MPEP 2142, Rev. 2, May 2004, Page 2100-128, right column). Since Buse in view of Cheshire, taken alone or in combination, do not disclose, teach, or suggest all of the limitations of claim 17, Applicants invention of claim 17 is not obvious over Buse in view of Cheshire as per MPEP2142.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that the cited references, Buse in view of Cheshire, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 17.

Claim 25 is believed allowable due to its dependence on otherwise allowable base claim 17. In addition, claim 25 further and patentably defines Applicants invention over Buse in view of Cheshire, taken alone or in combination.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that claims 1, 9, 10, 17, and 25 are allowable in their present respective forms, and thus respectfully request that the rejection of claims 1, 9, 10, 17, and 25 under 35 U.S.C. §103(a) be withdrawn.

Claims 2-6 and 18-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Buse in view of Cheshire, and in further view of Reed, et al., U.S. Patent No. 6,061,739 (hereinafter, Reed). Applicants respectfully request reconsideration of the rejection of claims 2-6 and 18-22 in view of the following.

Reed is directed to assigning a network address using a physical address resolution protocol (col. 1, lines 10-11). Reed discloses a method for assigning a network address to a new device coupled to a network without any additional infrastructure or pre-existing knowledge of the hardware address of the device (col. 4, lines 19-22). After the device is attached to the network, the device attempts to establish a connection on the network, which causes address resolution protocol (ARP) requests to be generated (col. 4, lines 22-25). The device monitors the communications on the network for unanswered ARP requests (col. 4, lines 25-27). When the device sees N unanswered ARP requests (where N is a preset

threshold) in a given length of time, the device adopts the requested network address and responds to the ARP with its hardware address (col. 4, lines 27-30, Fig. 2).

Applicants believe that claims 2-6 and 18-22 patentably define Applicants' invention over the cited references, Buse in view of Cheshire, and in further view of Reed, taken alone or in combination, for at least the reasons set forth below.

Each of claims 2-6 depend directly or indirectly from claim 1. As set forth above with respect to claim 1, the subject matter of claim 1 is not obvious over Buse in view of Cheshire. Applicants respectfully submit that Reed does not overcome the deficiency of Buse in view of Cheshire, as applied to claim 1, nor does the Examiner assert as much.

For example, like Cheshire, Reed discloses self configuration of an IP address. As set forth above, Reed et al, discloses that after being attached to a network, a device attempts to establish a connection, causing ARP requests to be generated, and when the device sees N unanswered ARP requests (where N is a preset threshold) in a given length of time, the device adopts the requested network address and responds to the ARP with its hardware address (col. 4, lines 22-30, Fig. 2). Thus, by sending and responding to ARP communications, the device configures itself with an IP address, in contrast to claim 1, wherein a computer performs the step of assigning the internet protocol address to the device (the network adapter) via the network, i.e., the network adapter is configured by the computer via the network.

Thus, for substantially the same reasons as set forth above with respect to claim 1 as with respect to Buse in view of Cheshire, it would not have been obvious to combine the teachings of Cheshire and Reed, i.e., self-configuration, with the allocation of IP addresses by proxy, as disclosed by Buse.

Accordingly, claim 1 is allowable over Buse in view of Cheshire, and in further view of Reed. Claims 2-6 are thus believed allowable due to their dependence on otherwise allowable base claim 1.

Claims 18-22 were rejected on the same basis as claims 2-6, and are believed allowable for substantially the same reasons as set forth above with respect to claims 2-6.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit claims 2-6 and 18-22 are allowable in their present respective forms, and thus respectfully request that the rejection of claims 2-6 and 18-22 under 35 U.S.C. §103(a) be withdrawn.

Claims 7, 11-16, and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Buse in view of Cheshire, and in further view of Mellquist, U.S. Patent No. 6,115,545. Applicants respectfully request reconsideration of the rejection of claims 7, 11-16, and 23 in view of the following.

Mellquist is directed to automated internet protocol (IP) address allocation and assignment for the internet protocol (col. 1, lines 7-9). As background, Mellquist discloses the use of a BOOTstrap Protocol (BOOTP) that allows clients to automatically receive all IP configuration information from a configured BOOTP server (col. 2, lines 26-30). In order to define an IP address, a free address in the range of valid addresses must be selected (col. 3, lines 12-14). Addresses are usually administered by a person who allocates these addresses to entities who require them (col. 3, lines 14-15). It is important that duplicate addresses are not allowed since this can cause major trouble (col. 3, lines 16-17). Also, a sub-net mask is required for proper operation, and must be the same on all entities across the sub-net (col. 3, lines 17-19).

The Mellquist apparatus includes a configuration module 41 that acts in place of a BOOTP server to accept and reply to a select set of BOOTP requests from devices, wherein the BOOTP response contains an IP address corresponding to a media access control (MAC) address for the device that submitted the BOOTP request (col. 5, lines 36-45). Once powered up, a network device 33 issues a broadcast BOOTP request 47 which will be picked up by IP configuration module 41, that issues a BOOTP response 48 by which network device 33 will obtain the IP configuration parameters and proceed to initialize (col. 5, line 66 to col. 6, line 5).

Applicants believe that claims 7, 11-16, and 23 patentably define Applicants' invention over the cited references, Buse in view of Cheshire, and in further view of Mellquist, taken alone or in combination, for at least the reasons set forth below.

Claim 7 depends from claim 1. As set forth above with respect to claim 1, the subject matter of claim 1 is not obvious over Buse in view of Cheshire. Applicants respectfully submit that Mellquist does not overcome the deficiency of Buse in view of Cheshire, as applied to claim 1, nor does the Examiner assert as much.

For example, as set forth above, Mellquist discloses that a network device 33 sends out a BOOTP request, and IP configuration module 41, standing in the place of a BOOTP server, provides a BOOTP response including an IP address to network device 33, which then proceeds to initialize. Thus network device 33 configures itself by obtaining an IP address from IP configuration module 41 that acts in the place of a BOOTP server, a process which is known in the art to be self-configuration. In contrast to a network device that configures itself based on submitting a BOOTP request and receiving a BOOTP response, as disclosed by Mellquist, claim 1 contemplates a computer that performs the step of assigning the internet

protocol address to the network device, i.e., the network adapter, via the network. As set forth above, this allows the use of a network adapter that is unable to configure itself, i.e., a network adapter that does not contain a mechanism for obtaining an IP address, and depends on another computer to do so (see Applicants' specification at page 4, lines 28-31).

Thus, for substantially the same reasons as set forth above with respect to claim 1 as with respect to Buse in view of Cheshire, it would not have been obvious to combine the teachings of Cheshire and Mellquist, i.e., self-configuration, with the allocation of IP addresses by proxy, as disclosed by Buse.

Accordingly, the asserted combination of Buse in view of Cheshire, and in further view of Mellquist, taken alone or in combination, does not disclose, teach, or suggest the subject matter of claim 1. Claim 7 is thus believed allowable due to its dependence on otherwise allowable base claim 1.

In addition, claim 7 recites, in part, determining if the network adapter has a valid internet protocol address. In rejecting claim 7, the Examiner again relies on Mellquist at column 3, lines 11-19. As set forth in their previous response, Applicants respectfully submit that the relied-upon language of Mellquist merely discloses that a required free address in the range of valid addresses must be selected (col. 3, lines 12-14), that addresses are usually administered by a person who allocates these addresses to entities who require them (col. 3, lines 14-15), and that duplicate addresses are not allowed (col. 3, lines 16-17). However, such language simply does not disclose, teach, or suggest any "determination" aspect, much less *determining if the network adapter has a valid internet protocol address*, as recited in claim 7. For example, the relied-upon Mellquist statements merely lists two existing constraints on IP

addresses, and merely that addresses are administered by a person who allocates the addresses, without stating that there is a determination as to whether an address is valid.

The relied upon Mellquist text simply does not disclose, teach, or suggest finding out if the address is valid by investigation, reasoning, or calculation, as would constitute determining if the address is valid. Rather, the relied upon text simply indicates that a free address must be used, indicates who usually provides the addresses, and indicates that duplicate addresses are not allowed. Accordingly, claim 7 is believed allowable in its own right.

Although the Examiner has maintained the same basis for the rejection of claim 7 as in the previous office action as with respect to Mellquist, the Examiner has not taken note of Applicants' arguments and has not answered the substance of Applicants' arguments, as required under MPEP 707.07(f). Thus, Applicants have been denied an opportunity to fully prosecute claim 7 by addressing the Examiner's rationale for the continued rejection of claim 7 notwithstanding that the relied-upon passage of Mellquist does not disclose, teach, or suggest a "determining" aspect. Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claim 7, or to respond to Applicants' argument and allow Applicants' an opportunity to respond to the Examiner's rationale in order to provide Applicants with an opportunity to fully prosecute claim 7.

Claim 11 is directed to a method of automatically assigning an internet protocol address to a device. Claim 11 recites, in part, determining if said low-cost network adapter has a valid internet protocol address. For substantially the same reasons as set forth above with respect to claim 7, Applicants respectfully submit that Buse in view of Cheshire, and in

further view of Mellquist does not disclose, teach, or suggest determining if the low-cost network adapter has a valid internet protocol address.

Claim 11 also recites, in part, the computer performing the steps of: generating an internet protocol address; incorporating said internet protocol address in an address resolution protocol probe; sending said address resolution protocol probe on said network; and determining whether a response to said address resolution protocol probe indicates that said internet protocol address is in use; wherein if said internet protocol address is not in use, then performing the step of assigning said internet protocol address to said low-cost network adapter via said network.

For substantially the same reasons as set forth above with respect to claim 1, Applicants invention of claim 11, as set forth above, is not obvious over Buse in view of Cheshire. Applicants respectfully submit that Mellquist does not overcome the deficiency of Buse in view of Cheshire, as applied to claim 11, nor does the Examiner assert as much.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that the cited references, Buse in view of Cheshire, and in further view of Mellquist, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 11.

Claims 12-16 are believed allowable due to their dependence on otherwise allowable base claim 11. In addition, claims 12-16 further and patentably define Applicants invention over Buse in view of Cheshire, and in further view of Mellquist.

Claim 23 is directed to the system of claim 17. Claim 23 recites, in part, wherein the computer executes preliminary instructions to determine if said network adapter has a valid internet protocol address. For substantially the same reasons as set forth above with respect to claim 7, Buse in view of Cheshire, and in further view of Mellquist, taken alone or in

combination, do not disclose, teach, or suggest wherein the computer executes preliminary instructions to determine if the network adapter has a valid internet protocol address, as recited in claim 23. Accordingly, claim 23 is believed allowable in its present form.

In addition, claim 23 is believed allowable due to its dependence on otherwise allowable base claim 17.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that claims 7, 11-16, and 23 are in condition for allowance in their present respective forms, and thus respectfully request that the rejection of claims 7, 11-16, and 23 under 35 U.S.C. §103(a) be withdrawn.

Claims 8 and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over Buse in view of Cheshire, in further view of Mellquist, and in further view of Troll, Request for Comments: 2563, May 1999, Troll R. Applicants respectfully request reconsideration of the rejection of claims 8 and 24 in view of the following.

Troll is directed to disabling stateless auto-configuration in IPv4 clients (page 1), and allowing a DHCP client to determine whether or not it should assign itself a “link-local” address (page 2). Troll also discloses an auto-configure option which allows a DHCP client to determine whether or not it should generate a link-local IP address.

Applicants believe that claims 8 and 24 patentably define Applicants’ invention over the cited references, Buse in view of Cheshire, in further view of Mellquist, and in further view of Troll, taken alone or in combination, for at least the reasons set forth below.

Claim 8 is directed to the method of claim 7, wherein prior to performing said generating step said method comprising the step of determining whether said network allows said computer to assign an internet protocol address to said network adapter.

Claim 8 depends from claim 7, which depends from claim 1. As set forth above with respect to claim 7, Buse in view of Cheshire, and in further view of Mellquist does not disclose, teach, or suggest the subject matter of either of claims 1 or 7. Applicants respectfully submit that Troll does not overcome the deficiency of Buse in view of Cheshire, and in further view of Mellquist, nor does the Examiner assert as much.

For example, as set forth above, and as acknowledged by the Examiner, Troll is directed to a DHCP client assigning itself an IP address, which is known in the art as self assignment, or self configuration. In contrast, however, claims 1 and 7 contemplate a computer that performs the step of assigning the internet protocol address to the network device, i.e., the network adapter, via the network. As set forth above, this allows the use of a network adapter that is unable to configure itself, i.e., a network adapter that does not contain a mechanism for obtaining an IP address, and depends on another computer to do so (see Applicants' specification at page 4, lines 28-31).

Thus, for substantially the same reasons as set forth above with respect to claim 1 as with respect to Buse in view of Cheshire, it would not have been obvious to combine the teachings of Cheshire, Mellquist, and Troll, i.e., self-configuration, with the allocation of IP addresses by proxy, as disclosed by Buse.

Accordingly, the asserted combination of Buse in view of Cheshire, in further view of Mellquist, and in further view of Troll, taken alone or in combination, does not disclose, teach, or suggest the subject matter of claim 1. Claim 8 is thus believed allowable due to its dependence on otherwise allowable base claim 1.

In addition, Troll does not disclose, teach, or suggest determining whether the network allows the computer to assign an internet protocol address to the network adapter. Rather,

Troll discloses that a DHCP client will be able to determine whether the network is centrally administered, thus allowing it to determine whether or not it should assign itself an address (page 2). Troll also discloses that a DHCP client will be allowed to determine whether or not it should generate an address (page 3). However, the relied-upon Troll disclosures have no bearing on and do not disclose, teach, or suggest determining whether the network allows the computer to assign an internet protocol address to the network adapter, as recited in claim 8.

Accordingly, claim 8 is believed allowable in its own right.

Further, Applicants respectfully submit that the mere fact of the Examiner's reliance on a combination of 4 references to reject claim 8 supports Applicants' present contention of impermissible hindsight reconstruction of Applicants invention, using Applicants' disclosure as a blueprint.

Claim 24 is directed to the system of claim 23, wherein said preliminary instructions further determine whether said network allows said computer to assign an internet protocol address to said network adapter. Claim 24 is believed allowable for substantially the same reasons as set forth above with respect to claim 8.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that claims 8 and 24 are allowable in their present respective forms, and thus respectfully request that the rejection of claims 8 and 24 under 35 U.S.C. §103(a) be withdrawn.

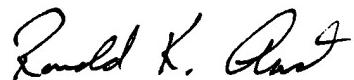
For the foregoing reasons, Applicants submit that the present application is in condition for allowance in its present form, and it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby  
2001-0158.02/LII0338.US

conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

Respectfully submitted,



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February 24, 2005

Date